

BWP IW 38 & BWP IW 39

Permit for Industrial Sewer User

W205484 Transmittal Number 343837

Facility ID# (if known)

DEP Use Only

Date Received

Important Instructions for Completing This Form

The questions on this form apply to existing and new facilities discharging industrial wastewater to sewers. If you are completing this form for an existing facility, answer the questions as they apply to its current status. If you are completing this form for a new facility, your answers will reflect your commitment to comply with the requirements as set forth in each question.

Existing facilities are defined as facilities in existence as of July 12, 2007. New facilities are defined as facilities constructed after July 12, 2007.

Answer all questions, except those that you are directed to skip. Please DO NOT answer questions that you are directed to skip

Permit Category (Select One)

- ☑ BWP IW 38: Industrial Sewer User in IPP POTW discharging more than 50,000 GPD
- ☐ BWP IW 39: Industrial Sewer User in Non-IPP POTW discharging more than 25,000 GPD

A. Facility Information

1i. Federal Employer Tax Identification Number (FEIN or TIN)

When filling out
forms on the
computer, use
only the tab key
to move your
cursor - do not
use the return

Important:





Newark America	•		
1a. Facility Name		<u> </u>	
100 Newark Way			
1b. Facility Address 1			
	•		
1c. Facility Address 2			
Fitchburg	MA	01420	
1d. City	1e. State	1f. Zip Code	
(978) 665-2600	(978) 665-2750		
1g. Phone Number	1h. Fax Number		
222004044			

 □ Check here if same as Facility Address and skip to Contact Information. Mailing Address:

2a. Mailing Address: Street or P.O. Box 2b. Mailing Address 2 2c. City 2d. State 2e. Zip Code

Contact Information:

Dana Pelletier 3a. Contact Person Name General Manager 3b. Contact Person Title (978) 665-2608 N/A 3c. Phone Number 3d. Extension

dpelletier@tngus.com

3e. Email Address



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☐ 1a. New Construction			☐ 1b. Permit Renewal		
Ta. New Constitution					
☐ 1c. Increasing Flow From Existing Connection		nection	1d. New or Modified Industrial Wastewater Pretreatment System (IWPS)		
	permitted Connection d Before 7/12/07)				
**					
best describe	the facility producing t	the discharge in te	I Industrial Classification erms of the principal prod Appendix B in the Instru	lucts or services	
2631 ·		Pai	perboard Mills		
2a. SIC Code			cription		
2672		Co	ated Laminated Paper M	anufacturing	
2b. SIC Code		Des	cription		
2679				er and Paperboard Products	
2c. SIC Code		Des	cription		
5093			cycled Material Wholesa	ler	
2d. SIC Code		Des	cription		
	1 3a. Connection #	2 3b. Connection #	3c. Connection #	3d. Total Flow,	
	Sa. Connection#	7,100	36. Connection ii	7,100	
SANITARY	GPD	7,100 GPD	GPD	GPD	
	664,000	O. D	0.0	664,000	
INDUSTRIAL	GPD	GPD	GPD	GPD	
	<u> </u>			671,100	
			1 .		
TOTAL	GPD	GPD	GPD	GPD	
	pliance with the Mass □ No* *If No, Y	sachusetts Historio	GPD cal Commission requirent ith Massachusetts Historica u Can Submit This Applicati	GPD nents?	



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. Industrial Wastew	ater Informa	tion (continued)	
Check all pollutants that treated, before discharge		ır industrial wastewater before	pretreatment, or if not
⊠ 6a. Metals, Asbestos, Cyar	ide, Phenois		
If Metals, Asbestos, Cyanid (mg/L):	e, or Phenols are	present, provide concentration	s in milligrams per liter
1. Antimony (total) (Sb)	<0.003 mg/L	9. Nickel (total) (Ni)	<0.04 mg/L
2. Arsenic (total) (As)	0.006 mg/L	10. Selenium (total) (Se)	<0.005 mg/L
3. Beryllium (total) (Be)	<0.001 mg/L	11. Silver (total) (Ag)	<0.02 mg/L
4. Cadmium (total) (Cd)	0.0002 mg/L	12. Thallium (total) (TI)	<0.005 mg/L
5. Chromium (hexavalent)	0.09 mg/L	13. Zinc (total) (Zn)	0.09 mg/L
6. Chrome (total) (Cr)	0.003 mg/L	14. Asbestos	<4.65 mg/L
7. Copper (total) (Cu)	<0.02 mg/L	15. Cyanide (total) (CN)	<0.01 mg/L
8. Lead (total) (Pb)	<0.0002 mg/L	16. Phenols (total)	0.09 mg/L
☐ 6b. Toxic Pollutants (See If Toxic Pollutants are prese (ug/L):		e Instructions.) al Toxic Pollutants concentratio	on in micrograms per liter
6b1. Total Toxic Pollutants Concen	tration (ug/L)	NOTE: Use the Toxic Pollut : toxic chemicals and their con	
☐ 6c. Total Petroleum Hydro	ocarbons (TPH) >	15 mg/L	
☐ 6d. pH <5 and >10 Stand	ard Units (S.U)		
☐ 6e. Other*			÷
*If Other Pollutants are prese	ent, describe them	n:	
N/A			. ·



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industriai	wastewater into	ormation (continued)
7. Is Mercury (discharge?	(Hg) present in your indu	istrial wastewater before pretreatment, or if not treated, befor
⊠ Yes	□ No*	*If No, skip to Question 8.
7a: If Yes, hav eliminate the n		ble mercury sources and taken all reasonable steps to
⊠ Yes*	□ No	*If Yes, skip to Question 8.
7b. If No, expla	ain why.	
	<u> </u>	
		
Mercury.		must meet a discharge limit of 1 part per billion (ppb) for vned Treatment Works (POTW) that receives your
Mercury. 8. What is the wastewater? (\$	name of the Publicly Ov See Appendix C in the In	vned Treatment Works (POTW) that receives your
Mercury. 8. What is the	name of the Publicly Ov See Appendix C in the In	vned Treatment Works (POTW) that receives your
8. What is the wastewater? (Sity of Fitchbul Name of POTW) 9. Do you have	name of the Publicly Ov See Appendix C in the In	vned Treatment Works (POTW) that receives your estructions.) ction discharge permit or a current written approval issued by
8. What is the wastewater? (Sity of Fitchbul Name of POTW) 9. Do you have	name of the Publicly Ov See Appendix C in the In rg	vned Treatment Works (POTW) that receives your astructions.) ction discharge permit or a current written approval issued by the Instructions.)
Mercury. 8. What is the wastewater? (Size of Fitchburname of POTW) 9. Do you have your local POT	name of the Publicly Ov See Appendix C in the In rg e a current sewer connec W? (See Section 17B in \[\sum No*	vned Treatment Works (POTW) that receives your astructions.) ction discharge permit or a current written approval issued by the Instructions.) *If No, you must obtain either a permit or, if a permit is no required, a written approval from your local POTW to
Mercury. 8. What is the wastewater? (Size of Fitchburname of POTW) 9. Do you have your local POT	name of the Publicly Ov See Appendix C in the In rg e a current sewer connec W? (See Section 17B in \[\sum No*	whed Treatment Works (POTW) that receives your astructions.) ction discharge permit or a current written approval issued by the Instructions.) *If No, you must obtain either a permit or, if a permit is not required, a written approval from your local POTW to discharge BEFORE you can submit this application. ing information, then skip to Question 10. December 31, 2008
Mercury. 8. What is the wastewater? (\$\frac{\city of Fitchbur}{Name of POTW}\$ 9. Do you have your local POT Yes If you have a positive in the positive in	name of the Publicly Ov See Appendix C in the In rg e a current sewer connec W? (See Section 17B in \(\sum \text{No*}\)	whed Treatment Works (POTW) that receives your astructions.) ction discharge permit or a current written approval issued by the Instructions.) *If No, you must obtain either a permit or, if a permit is no required, a written approval from your local POTW to discharge BEFORE you can submit this application. ing information, then skip to Question 10.
Mercury. 8. What is the wastewater? (Size of Fitchbul Name of POTW) 9. Do you have your local POT Yes If you have a possible of the possible of Poth Name of Nam	name of the Publicly Ov See Appendix C in the In rg e a current sewer connec W? (See Section 17B in \(\sum \text{No*}\)	when the treatment works (POTW) that receives your astructions.) ction discharge permit or a current written approval issued by the Instructions.) *If No, you must obtain either a permit or, if a permit is not required, a written approval from your local POTW to discharge BEFORE you can submit this application. ing information, then skip to Question 10. December 31, 2008
Mercury. 8. What is the wastewater? (Size of Fitchbul Name of POTW) 9. Do you have your local POT Yes If you have a possible of the possible of Poth Name of Nam	name of the Publicly Ov See Appendix C in the In rg e a current sewer connect W? (See Section 17B in No* ermit, provide the following	when the treatment works (POTW) that receives your estructions.) ction discharge permit or a current written approval issued by the Instructions.) *If No, you must obtain either a permit or, if a permit is not required, a written approval from your local POTW to discharge BEFORE you can submit this application. ing information, then skip to Question 10. December 31, 2008 9b. Permit Expiration Date

Yes*

☐ No

*If Yes, skip to Question 12.



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B.	Industrial	Wastewater	Information	(continued)
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		ection discharge permit or a current written approval issued by ion 17B in the Instructions.)
☐ Yes	□ No*	If No, you must obtain either a permit or written approval from your local Sewer Authority to discharge BEFORE you can submit this application.
If you have a p	permit, provide the follow	ring information, then skip to Question 12.
11a. Permit Numb	per	11b. Permit Expiration Date
If you have a v	written approval, provide	the following information:
11c. Date of Appro	oval Letter	11d. Name of Person Who Signed the Letter
	ility currently classified a (See Appendix D in the l	s a Categorical Industrial User (CIU) pursuant to Federal Instructions.)
Yes	☐ No*	*If No, skip to Section C.
12a. List all the	e Categorical Pretreatme	ent Standards applicable to your facility. Pulp, Paper, and Paperboard
12a1. Part Numbe	er	Point Source Category
12a2. Part Numbe	r	Point Source Category
12a3. Part Numbe	r	Point Source Category
12a4. Part Numbe	r	Point Source Category
Industrial	Wastewater Pre	treatment System
1. Do you have wastewater?	an on-site industrial wa	stewater pretreatment system (IWPS) to treat your industrial
⊠ Yes	☐ No*	*If No, skip to Section D.
1a. How many	IWPSs do you have?	
1		NOTE: If you have more than one IWPS, please use an Additional IWPS Form for each additional IWPS.
Number		Additional IVII O Form for each additional IVII'O.
1b. Provide a u	nique identifier (i.e. nam	e) for this IWPS:
Water Polishing	•	
Identifier/Name	-	



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C. Industrial	Wastewater	Pretreatment	System	(continued)

1c. What is the	e Total Design Capad	city of this IWPS?
2,400,000		
Gallons Per Day		
1d. What is the	e Average Daily Flow	of this IPWS? (Estimate if this is a new facility.)
1,400,000 Gallons Per Day		
1e. What is the	e Maximum Daily Flo	w of this IWPS? (Estimate if this is a new facility.)
2,400,000 Gallons Per Day		
		structed to meet all local discharge standards and the applicable andards in 40 CFR Chapter I, Subchapter N?
⊠ Yes	□ No*	*If No, you must take immediate steps to address the non-compliance BEFORE you can submit this application.
	VPS treat hazardous 14 CMR 7.02?	industrial wastewater or hazardous industrial wastewater sludge
☐Yes	⊠ No*	*If No, skip to Question 12.
3a. Are you tre products?	eating concentrated cl	hemical baths, e.g. spent chemical baths, or off-specification
☐ Yes	□ No*	*If No, skip to Question 4.
3b. If Yes, des	cribe the concentrate	d chemical baths you are treating.
	VPS meet the require fined in 310 CMR 30.	ements of "treatment which is an integral part of the manufacturing .010?
☐ Yes*	□ No	*If Yes, skip to Question 7.
		wastewater or hazardous industrial wastewater sludge that is roduction processes, in tanks or containers?
located in a Drinl	king Water Zone (see S	rage of hazardous industrial wastewater or sludge and your IWPS is Section 17C of the Instructions; reference language in 310 CMR 30.605), W 38 or BWP IW 39 permit. You must use form BWP IW 40 instead.
☐ Yes	□ No*	*If No, skip to Question 7.



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industrial wa	astewater Preti	reatment System (continued)	
6. Are you in compl 343? (See Section	liance with the require	ements for tanks and containers in 310 CMR 30.342 as)	2 and
☐ Yes	□ No*	*If No, you must take immediate steps to addre compliance BEFORE you can submit this appli	
7. Do you have a U identification number		otection Agency (EPA) hazardous waste generator	
☐ Yes	□ No*	*If No, skip to Question 7b.	
7a. What is your EF	PA identification numb	per?	
		Skip to Question 8.	•
EPA ID#	•		•
7b. Explain why you	u do not have an EPA	identification number.	
<u></u>		· · · · · · · · · · · · · · · · · · ·	
8. Do you have a vi	sible sign in place tha	t warns against unauthorized entry into the IWPS a	rea?
☐ Yes*	□ No	*If Yes, skip to Question 9.	
8a. Explain why you	ı do not have a visible	sign in place.	
		·	
9.Do you have the re	equired spill containm	nent for the IWPS? (See Section 17C in the Instruc	itions.)
9.Do you have the re □ Yes*	equired spill containm ☐ No	nent for the IWPS? (See Section 17C in the Instruc	itions.)
□ Yes*	□ No		itions.)
□ Yes*	□ No	*If Yes, skip to Question 10.	itions.)
□ Yes*	□ No	*If Yes, skip to Question 10.	itions.)
□ Yes*	□ No	*If Yes, skip to Question 10.	itions.)
□ Yes* 9a. Explain why you	□ No I do not have the requ	*If Yes, skip to Question 10.	

☐ Yes

☐ No*

*If No, skip to Question 12.



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orinition mad	O	Facility ID# (IT Known)	
. Industrial	Wastewater Pr	etreatment System (continued)	_
11. Are you in o		ood-proofing provisions in 310 CMR 30.701(2)? (See Section	
☐ Yes	□·No*	*If Yes, skip to Question 12.	
11a. Explain wh	ny you are not in comp	pliance with the flood-proofing provisions in 310 CMR 30.701(2	2).
12. What type o	f IWPS do you have?	(Check all that apply.)	
☑ Fully Automa	ited Industrial Wastew	ater Pretreatment System (FAIWPS)	
☐ Continuous [Discharge IWPS	☐ Batch IWPS	
13. Is the IWPS	exempt from classification	ation? (See Section 17C in the Instructions.)	
☐ Yes*	⊠ No	*If Yes, skip to Question 14.	
13a. What is the Treatment Facili		WPS? (See 257 CMR 2.13: Classification of Wastewater	
☐ Class 1I	☐ Clas	ss 2I	
☐ Class 4I	⊠ Clas	ss 5 or 6C	
☐ Class 2M	☐ Clas	ss 3M	
13b. How was th	ne IWPS' classification	determined?	
☐ In accordance	e with the requirement	ts in 314 CMR 7.05(2)(g) 4. c. or d.	
⊠ By the Board	of Certification of Ope	erators of Wastewater Treatment Facilities	
☐ Both			
14. Is the IWPS 17C in the Instru		with the requirements of 314 CMR 7.05(2)(g) 5? (See Section	1
⊠ Ves*	□ No	*If Yes, skin to Question 15	



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. Industrial Wa	astewater Pro	etreatment System (continued)	
14a. Explain why th	ne IWPS is not staf	fed in accordance with 314 CMR 7.05(2)(g) 5.	
provide continuous	coverage during IV	ion, we are staffing with two qualified licensed operators to WPS Operations. Alarmed stations are staffed during all IWPS operator in the event of emergency.	
	application a reques	under Permit Category BWP IW 38 or BWP IW 39 for this st for modification of this IWPS that currently has a BWP IW 38	
⊠ Yes*	□ No	*If Yes, you need to submit as an attachment the process flow diagram and description of the principal treatment processes for your IWPS. Otherwise, skip to Question 17.	
16. How many attac	chments are includ	ed with this application in response to Question 15?	
2 - Attachments 2. a Number of Attachments			
17. Have your sewer connection and IWPS been designed and constructed in compliance with the design and construction standards as set forth in 314 CMR 7.05(2)(g)3?			
⊠Yes	□ No*	*If No, skip to Question 17b.	
17a. What is the Ma engineering plans?	assachusetts Regis	stered Professional Engineer (MAPE) signature date on the	
January 11, 2008		Skip to Question 18.	
Date			
		on and IWPS have not been designed and constructed in ruction standards as set forth in 314 CMR 7.05(2)(g)3.	
Existing IWPS. Mas	ss PE Engineering	Assesment & Review was completed in January of 2008.	
		bout the Massachusetts Registered Professional Engineer	
(INVLE) MIIO IEAIGM	eu, stampeu, and s	signed your engineering plans:	
Ralph E. Oulton		207-828-3467	
18a. Name		18b. Phone Number	
36644	Number	General (Civil)	
18c. Mass. P.E. License	NUTTOET	18d. Mass. P.E. Specialty	



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19. Do you have an IWPS operation and maintenance manual that complies with the procedures and other requirements in 314 CMR 7.05(2)(g)6.? □ Yes* □ No *If Yes, skip to Question 20. 19a. Explain why you do not have the required IWPS operation and maintenance manual. 20. Are you keeping your IWPS operation and maintenance manual current? □ Yes □ No 21. Are you implementing your IWPS operation and maintenance manual? □ Yes □ No 2. Are you keeping your currently effective sewer discharge permit(s), IWPS plan(s), and current operation and maintenance manual(s) (as applicable) on-site at all times? □ Yes* □ No *If Yes, skip to Question 2. 1a. Explain why you are not keeping these records on-site at all times. 2. Are you keeping all your required records including your wastewater monitoring and analyses records, operation and maintenance records and logs, bills of lading, summary reports of all incidents requiring implementation of the safety plan, and hazardous waste manifests (as applicable) on-site for at least three years? □ Yes* □ No *If Yes, skip to Question 3. 2a. Explain why you are not keeping these records on-site for at least three years.				
other requirements in 314 CMR 7.05(2)(g)6.? ☐ Yes* ☐ No *If Yes, skip to Question 20. 19a. Explain why you do not have the required IWPS operation and maintenance manual. 20. Are you keeping your IWPS operation and maintenance manual current? ☐ Yes ☐ No 21. Are you implementing your IWPS operation and maintenance manual? ☐ Yes ☐ No Nonitoring, Reporting & Recordkeeping 1. Are you keeping your currently effective sewer discharge permit(s), IWPS plan(s), and current operation and maintenance manual(s) (as applicable) on-site at all times? ☐ Yes* ☐ No *If Yes, skip to Question 2. 1a. Explain why you are not keeping these records on-site at all times. 2. Are you keeping all your required records including your wastewater monitoring and analyses records, operation and maintenance records and logs, bills of lading, summary reports of all incidents requiring implementation of the safety plan, and hazardous waste manifests (as applicable) on-site for at least three years? ☐ Yes* ☐ No *If Yes, skip to Question 3.)	. Industrial Was	stewater Pretreati	ment System (continued)
19a. Explain why you do not have the required IWPS operation and maintenance manual. 20. Are you keeping your IWPS operation and maintenance manual current? ☑ Yes □ No 21. Are you implementing your IWPS operation and maintenance manual? ☑ Yes □ No D. Monitoring, Reporting & Recordkeeping 1. Are you keeping your currently effective sewer discharge permit(s), IWPS plan(s), and current operation and maintenance manual(s) (as applicable) on-site at all times? ☑ Yes* □ No * If Yes, skip to Question 2. 1a. Explain why you are not keeping these records on-site at all times. 2. Are you keeping all your required records including your wastewater monitoring and analyses records, operation and maintenance records and logs, bills of lading, summary reports of all incidents requiring implementation of the safety plan, and hazardous waste manifests (as applicable) on-site for at least three years? ☑ Yes* □ No * If Yes, skip to Question 3.				tenance manual that complies with the procedures and
20. Are you keeping your IWPS operation and maintenance manual current? ☑ Yes □ No 21. Are you implementing your IWPS operation and maintenance manual? ☑ Yes □ No D. Monitoring, Reporting & Recordkeeping 1. Are you keeping your currently effective sewer discharge permit(s), IWPS plan(s), and current operation and maintenance manual(s) (as applicable) on-site at all times? ☑ Yes* □ No * If Yes, skip to Question 2. 1a. Explain why you are not keeping these records on-site at all times. 2. Are you keeping all your required records including your wastewater monitoring and analyses records, operation and maintenance records and logs, bills of lading, summary reports of all incidents requiring implementation of the safety plan, and hazardous waste manifests (as applicable) on-site for at least three years? ☑ Yes* □ No * If Yes, skip to Question 3.		⊠ Yes*	☐ No	*If Yes, skip to Question 20.
 Yes □ No 21. Are you implementing your IWPS operation and maintenance manual? Yes □ No Nonitoring, Reporting & Recordkeeping 1. Are you keeping your currently effective sewer discharge permit(s), IWPS plan(s), and current operation and maintenance manual(s) (as applicable) on-site at all times? ☑ Yes* □ No * If Yes, skip to Question 2. 1a. Explain why you are not keeping these records on-site at all times. 2. Are you keeping all your required records including your wastewater monitoring and analyses records, operation and maintenance records and logs, bills of lading, summary reports of all incidents requiring implementation of the safety plan, and hazardous waste manifests (as applicable) on-site for at least three years? ☑ Yes* □ No * If Yes, skip to Question 3. 		19a. Explain why you	u do not have the required	IWPS operation and maintenance manual.
 Yes □ No 21. Are you implementing your IWPS operation and maintenance manual? Yes □ No Nonitoring, Reporting & Recordkeeping 1. Are you keeping your currently effective sewer discharge permit(s), IWPS plan(s), and current operation and maintenance manual(s) (as applicable) on-site at all times? ☑ Yes* □ No * If Yes, skip to Question 2. 1a. Explain why you are not keeping these records on-site at all times. 2. Are you keeping all your required records including your wastewater monitoring and analyses records, operation and maintenance records and logs, bills of lading, summary reports of all incidents requiring implementation of the safety plan, and hazardous waste manifests (as applicable) on-site for at least three years? ☑ Yes* □ No * If Yes, skip to Question 3. 				
 ∑ Yes ☐ No 21. Are you implementing your IWPS operation and maintenance manual? ∑ Yes ☐ No D. Monitoring, Reporting & Recordkeeping 1. Are you keeping your currently effective sewer discharge permit(s), IWPS plan(s), and current operation and maintenance manual(s) (as applicable) on-site at all times? ∑ Yes* ☐ No * If Yes, skip to Question 2. 1a. Explain why you are not keeping these records on-site at all times. 2. Are you keeping all your required records including your wastewater monitoring and analyses records, operation and maintenance records and logs, bills of lading, summary reports of all incidents requiring implementation of the safety plan, and hazardous waste manifests (as applicable) on-site for at least three years? ∑ Yes* ☐ No * If Yes, skip to Question 3. 				
21. Are you implementing your IWPS operation and maintenance manual? ☐ Yes ☐ No D. Monitoring, Reporting & Recordkeeping 1. Are you keeping your currently effective sewer discharge permit(s), IWPS plan(s), and current operation and maintenance manual(s) (as applicable) on-site at all times? ☐ Yes* ☐ No * If Yes, skip to Question 2. 1a. Explain why you are not keeping these records on-site at all times. 2. Are you keeping all your required records including your wastewater monitoring and analyses records, operation and maintenance records and logs, bills of lading, summary reports of all incidents requiring implementation of the safety plan, and hazardous waste manifests (as applicable) on-site for at least three years? ☐ Yes* ☐ No * If Yes, skip to Question 3.		20. Are you keeping	your IWPS operation and	maintenance manual current?
 Nonitoring, Reporting & Recordkeeping 1. Are you keeping your currently effective sewer discharge permit(s), IWPS plan(s), and current operation and maintenance manual(s) (as applicable) on-site at all times? ☑ Yes* ☐ No * If Yes, skip to Question 2. 1a. Explain why you are not keeping these records on-site at all times. 2. Are you keeping all your required records including your wastewater monitoring and analyses records, operation and maintenance records and logs, bills of lading, summary reports of all incidents requiring implementation of the safety plan, and hazardous waste manifests (as applicable) on-site for at least three years? ☑ Yes* ☐ No * If Yes, skip to Question 3. 		⊠ Yes	□ No	
D. Monitoring, Reporting & Recordkeeping 1. Are you keeping your currently effective sewer discharge permit(s), IWPS plan(s), and current operation and maintenance manual(s) (as applicable) on-site at all times? ☑ Yes* ☐ No * If Yes, skip to Question 2. 1a. Explain why you are not keeping these records on-site at all times. 2. Are you keeping all your required records including your wastewater monitoring and analyses records, operation and maintenance records and logs, bills of lading, summary reports of all incidents requiring implementation of the safety plan, and hazardous waste manifests (as applicable) on-site for at least three years? ☑ Yes* ☐ No * If Yes, skip to Question 3.		21. Are you impleme	enting your IWPS operation	and maintenance manual?
 Are you keeping your currently effective sewer discharge permit(s), IWPS plan(s), and current operation and maintenance manual(s) (as applicable) on-site at all times?		⊠ Yes	□ No	
operation and maintenance manual(s) (as applicable) on-site at all times? ☑ Yes* ☐ No * If Yes, skip to Question 2. 1a. Explain why you are not keeping these records on-site at all times. 2. Are you keeping all your required records including your wastewater monitoring and analyses records, operation and maintenance records and logs, bills of lading, summary reports of all incidents requiring implementation of the safety plan, and hazardous waste manifests (as applicable) on-site for at least three years? ☑ Yes* ☐ No * If Yes, skip to Question 3.		• .		
operation and maintenance manual(s) (as applicable) on-site at all times? ☑ Yes* ☐ No * If Yes, skip to Question 2. 1a. Explain why you are not keeping these records on-site at all times. 2. Are you keeping all your required records including your wastewater monitoring and analyses records, operation and maintenance records and logs, bills of lading, summary reports of all incidents requiring implementation of the safety plan, and hazardous waste manifests (as applicable) on-site for at least three years? ☑ Yes* ☐ No * If Yes, skip to Question 3.).	Monitoring, Re	eporting & Record	dkeeping
2. Are you keeping all your required records including your wastewater monitoring and analyses records, operation and maintenance records and logs, bills of lading, summary reports of all incidents requiring implementation of the safety plan, and hazardous waste manifests (as applicable) on-site for at least three years? □ No * If Yes, skip to Question 3.				
2. Are you keeping all your required records including your wastewater monitoring and analyses records, operation and maintenance records and logs, bills of lading, summary reports of all incidents requiring implementation of the safety plan, and hazardous waste manifests (as applicable) on-site for at least three years? ☑ Yes* ☐ No * If Yes, skip to Question 3.		⊠ Yes*	□ No	* If Yes, skip to Question 2.
records, operation and maintenance records and logs, bills of lading, summary reports of all incidents requiring implementation of the safety plan, and hazardous waste manifests (as applicable) on-site for at least three years? Yes* No * If Yes, skip to Question 3.		1a. Explain why you	are not keeping these reco	ords on-site at all times.
records, operation and maintenance records and logs, bills of lading, summary reports of all incidents requiring implementation of the safety plan, and hazardous waste manifests (as applicable) on-site for at least three years? No * If Yes, skip to Question 3.				
records, operation and maintenance records and logs, bills of lading, summary reports of all incidents requiring implementation of the safety plan, and hazardous waste manifests (as applicable) on-site for at least three years? No * If Yes, skip to Question 3.				
		records, operation an requiring implementar	nd maintenance records an ition of the safety plan, and	nd logs, bills of lading, summary reports of all incidents
2a. Explain why you are not keeping these records on-site for at least three years.		⊠ Yes*	□ No	* If Yes, skip to Question 3.
		2a. Explain why you a	are not keeping these reco	ords on-site for at least three years.
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Bureau of Waste Prevention – Industrial Wastewater

BWP IW 38 & BWP IW 39

Permit for Industrial Sewer User

W205484	
Transmittal Number	
0.40007	
343837	
Facility ID# (if known)	

D. Monitoring, Reporting & Recordkeeping (continued)

3. [Reserved for Toxics Reporting]

Additional reporting requirements will be added to this section in the future.

E. GCICIGI & ODCCING I IONDRON	& Specific Prohibitions
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1. After carefully reviewing all of the general and specific prohibitions listed below, are you in compliance with these General and Specific Prohibitions?				
⊠ Yes*	□ No	*If Yes, read Section F and then complete Section G.		
1a. Identify all the prohibitions you are not in compliance with and explain why. Attach an additional sheet of paper to this form, if necessary.				

- 1. General Prohibitions. The permittee shall not:
 - a. Discharge, or cause to be discharged to a POTW, any substances, materials, or wastewater that may:
 - i. harm the sewers, POTW wastewater treatment process or equipment;
 - ii. have an adverse impact on the receiving waters; or
 - iii. otherwise create a nuisance or endanger public health, safety, or the environment.
 - b. Introduce pollutants into POTWs that pass through the POTW or interfere with its operation or performance.
 - c. Discharge wastewater or allow discharge of wastewater through any sewer connection that would result in a hazard to the public health or safety.
 - d. Discharge bypass wastewater or allow discharge of bypass wastewater through any sewer connection. If bypassing due to an emergency condition occurs, the Department and POTW shall be notified in accordance with 314 CMR 7.04(3). Such notification or its acknowledgement shall not be construed as permission by the Department or POTW to discharge bypass wastewater.
 - e. Discharge hazardous waste or allow the discharge of hazardous waste through any sewer connection.
- Specific Prohibitions. The permittee shall not introduce into a POTW or its wastewater collection system the following:
 - a. Pollutants which may create a fire, explosion, or other hazard in the POTW or its wastewater collection system.
 - b. Pollutants which may cause corrosive structural damage to the POTW or its wastewater collection system. In no case shall discharges with a pH lower than 5.0 Standard Unit (S.U) or more than 10.0 S.U. be allowed, unless the local limit allows such discharges.
 - c. Solid or viscous pollutants in amounts which may cause obstruction to the flow in the POTW or its wastewater collection system or may result in interference.
 - d. Any pollutant, including oxygen-demanding pollutants, discharged at a flow rate or pollutant concentration that will cause interference with the POTW or its wastewater collection system.
 - e. Heat in amounts which may inhibit biological activity in the POTW, resulting in interference. In no case shall heat in such quantities that the temperature at the POTW treatment plant exceeds 40° C (104° F) be discharged, unless the Department, upon request of the POTW, approves alternate temperature limits.



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F. Additional Conditions

a. All discharges shall be in compliance with the terms and conditions of this permit. The discharge of any wastewater at a level in excess of that identified and authorized by this permit shall constitute a violation of the terms and conditions of this permit. Such a violation may result in the imposition of civil and/or criminal penalties as provided for in M.G.L. c.21, Section 42.

b. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:

i. Violation of any terms or conditions of the permit;

ii. Obtaining a permit by misrepresentation or failure to disclose fully all relevant facts; or

iii. A change in conditions or the existence of a condition, which requires either a temporary or permanent reduction, or elimination of the authorized discharge.

c. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges; nor does it authorize or relieve the permittee of any liability for any injury to private property or any invasion of personal rights; nor any infringement of Federal, State, or local laws or regulations; nor does it waive the necessity of obtaining any local assent required by law for the discharge authorized herein by the Department.

d. The provisions of this permit are severable, and the invalidity of any condition or subdivision thereof

shall not make void any other condition or subdivision thereof.

- e. All information and data provided by an applicant or a permittee identifying the nature and frequency of a discharge shall be available to the public without restriction. All other information (other than effluent data) which may be submitted by an applicant in connection with a permit application shall also be available to the public unless the applicant or permittee is able to demonstrate that the disclosure of such information or particular part thereof to the general public would divulge methods or processes entitled to protection as trade secrets in accordance with the provisions of M.G.L. c.21, Section.27(7). Where the applicant or permittee is able to so demonstrate, the Department shall treat the information or the particular part (other than effluent data) as confidential and not release it to any unauthorized person. Such information may be divulged to other officers, employees, or authorized representatives of the Commonwealth or the United States Government concerned with the protection of public water or water supplies.
- f. Transfer of Permits. Any sewer system connection permit authorizing an industrial discharge to a sewer system is only valid for the person to whom it is issued, unless prior to transfer:
 - i. The current permittee notifies the Department in writing at least 30 days in advance of the proposed transfer date; and
 - ii. The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibilities, and liability to the new permittee.
- g. This permit authorizing the discharge expires five (5) years from the date of issuance. The permittee shall apply for a renewal of this permit at least ninety (90) days prior to the expiration date, in accordance with 314 CMR 7.09(3)(b) for continued lawful discharges beyond the expiration date. h. All solids, sludge, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be collected, treated, and disposed of in accordance with applicable provisions in the following:
 - i. Hazardous waste regulations (310 CMR 30.000).
 - ii. Solid waste regulations (310 CMR 19.00).
 - iii. Sewer discharge regulations (314 CMR 7.00).
 - iv. Any other applicable federal, state and local laws.
- i. All samples shall be analyzed by a Massachusetts Certified Laboratory.
- j. The permittee shall provide the Department, and the Department's employees, authorized representatives and contractors, access at to the facility at all reasonable times, including during wastewater treatment system operation or wastewater discharge, for purposes of conducting activities related to oversight of this permit, including inspections to monitor compliance with the terms herein. The permittee shall allow the Department to obtain information related to compliance with the requirements of this permit. Notwithstanding any provision of this permit, the Department retains all of its access authorities and rights under applicable state and federal law.



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G. Certification Statement

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true accurate, and complete. I certify that this facility is in compliance with all conditions and requirements of this permit, and all applicable statutes and regulations. I further certify that systems to maintain compliance are in place at the facility or unit and will be maintained even if processes or operating procedures are changed. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment of knowing violations."

(I will be responsible for publication of public notice of the applicable permit proceedings identified under 314 CMR 2.06(1)(a) through (d).)

Printed Name of Applicant		
General Manager		
Title		
signature on original		
Signature of Applicant		
1-11-2008		
Date Signed		
William Doerr, PE		
Name of Preparer		
Corporate Manager of Environmental Affairs		
Title		
(740) 862-3594		
Phone Number		

Dana Pelletier

MassDEP Use Only	
Special Conditions:	
See Attachment 1.	

This document is a permit issued pursuant to Massachusetts General Laws, Chapter 21, Section 43 and Massachusetts regulations at 314 CMR 7.00. The permittee shall comply with all of the provisions contained in the permit application which are hereby incorporated and made part of this permit.

4/17/0

4/17/08

Name of Regional BWP Section Chief

4//7//3 Permit Expiration Da

Signature



Bureau of Waste Prevention - Industrial Wastewater

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ATTACHMENT 1.

Special Conditions:

- 1. The permittee shall maintain compliance with the City of Fitchburg's sewer use requirements and the terms and conditions of any applicable wastewater discharge permits issued by the city.
- 2. The permittee shall comply with the Effluent Guidelines and Standards at 40 CFR, Chapter I, Subchapter N, Part 430 The Pulp, Paper, and Paperboard Point Source Category, and applicable subcategories.
- 3. The permittee shall notify MassDEP of additional Effluent Guidelines and Standards as they are determined to be applicable to the facility.
- 4. The documents and materials attached to and referenced in the permit application are incorporated as part of the permit.

2.3 INDUSTRIAL WASTEWATER PRETREATMENT SYSTEM DESCRIPTION

Approximately 2 million gallons per day (gpd) of process wastewater is pumped from the mill to the IWPS for processing. The treatment method is primary clarification followed by secondary biological activated sludge treatment. Approximately 63% of the flow is returned to the mill for reuse in the showers following treatment by primary clarification only. Approximately 22% is returned to the mill following secondary treatment. Approximately 15% of the water sent to the IWPS is eventually discharged to the municipal sewer. The components of the IWPS are briefly described in the following subsections.

2.3.1 Surge Tank

Process wastewater from the mill is discharged to the Surge Tank by the mill Filtrate Pumps. This wastewater originates as excess filtrate from the stock prep thickening process. Filtrate from the Gravity Table in the sludge processing area is also added to this tank. A cationic coagulant is also added to improve clarification. Water is pumped from the Surge Tank to the Primary Clarifier by a variable speed pump. The rate of pumping is controlled by the level in the Clarifier Effluent Tank.

2.3.2 Primary Clarifier

The Primary Clarifier is an 80-foot diameter, Eimco clarifier for removal of bulk solids prior to reuse in the mill or further treatment. Water is fed to the Primary Clarifier from the Surge Tank. Clarified water is discharged to the Clarifier Effluent Tank. Sludge and Scum are discharged to the Blend Tanks for Sludge Processing.

2.3.3 Clarifier Effluent Tank

The primary clarified water is discharged by gravity to the Clarifier Effluent Tank. Water can be pumped from this tank back into the mill for reuse in the mill showers, to the shower water tank for reuse in the sludge processing showers, or to the SBRs for further treatment. The amount sent to each is based on demand and is controlled by automated valves.

2.3.4 PWPP Shower Tank

The PWPP shower tank receives water from the Clarifier Effluent Tank and feeds the showers on the gravity table and belt filter press in the sludge dewatering process.

2.3.5 Blend Tank

The Blend Tank receives sludge from the primary clarifier and the SBRs. It also receives floating scum from the primary clarifier, water from the building sump pumps in the PWPP, and pressate returned from the sludge belt press. It mixes these components and is pumped to the sludge processing components.

2.3.6 Sludge Processing

Sludge processing consists of two stages of thickening. The first is a gravity table thickener followed by a belt press thickener. Through these two processes sludge is dewatered to 35–40% solids. Sludge is sent off site for reuse in the production of compost materials. Filtrate from the gravity table is returned to the Surge Tank and pressate from the Belt Press is returned to the Blend Tank. Hydrogen peroxide (50% concentration) is added to the filtrate and pressate to control odors.

2.3.7 Sequencing Batch Reactors

The SBRs are fed from the clarifier effluent tank by the clarifier effluent pumps. There are two Aqua Aerobics SBRs each with a 1.8 million gallon volume. The SBRs are an aerobic biological treatment process that follows a set sequence of operations to treat wastewater in batches. Sufficient air is supplied to the SBRs by aeration blowers. The sequence followed is as follows:

- 1. Mix-Fill
 - Influent enters reactor
 - Complete mix of contents is achieved without use of aeration
- 2. React-Fill
 - Influent flow continues under mixed and aerated conditions
- 3. React

- Influent flow is terminated
- Mixing and aeration continue in absence of raw waste

4. Settle

- Influent flow does not enter reactor
- · Mixing and aeration cease

Decant-Sludge Waste

- Influent flow does not enter reactor
- Mixing and aeration remain off
- Decantable volume removed by subsurface withdrawal.
- Reactor is immediately ready to receive next batch of raw influent
- A small amount of sludge is wasted near end of each cycle

Decant water is discharged by gravity to the Hardinge Tank. Waste activated sludge is discharged by pump to the Blend Tank for sludge processing. When one SBR is in the React, Settle, and Decant-Sludge Waste cycles the other SBR is filling. There are three operating blowers for the SBRs.

2.3.8 Hardinge Tank

Treated water from the SBRs is discharged to the Hardinge Tank. The Hardinge Tank is pumped to the Seal Water/Superclarified Water Chests. No treatment occurs in the Hardinge Tank.

2.3.9 Seal Water/Superclarified Water Chests

Treated water is pumped into the Seal Water/Superclarified Water Chests from the Hardinge Tank. In addition, fresh pond water treated by sand filtration can be added to these tanks as make-up water. Water is discharged from these tanks by two pumps. The seal water pump transfers water from the Seal Water Chest to the seal water piping system for use in seals for rotating equipment in the plant, as well as to the mill hose stations. The superclarified water pump transfers water to the mill showers or to effluent trench for discharge to the sewer and WFWWTP. Discharge to the effluent trench is controlled by an automated valve that is tied into the plant control system.

2.3.10 Effluent Trench

Treated water is discharged to the effluent trench by the automated valve on the discharge pipeline of the Superclarified Water Pump. The water is discharge in the trench behind a v-notch weir. Non-contact cooling water that originates from process cooling operations can also be discharged to the trench at this location. The water elevation on the weir is continuously measured and discharge flow is calculated according to the formula for the weir. Composite or grab samples are collected automatically by an automated sampler from the trench. Continuous pH and temperature measurements are collected at this point and recorded.

